## REMARKS

Applicant thanks the Examiner for the Examiner's comments, which have greatly assisted Applicant in responding. Further, Applicant thanks the Examiner for conducting an interview on April 15, 2010. During the interview, Applicant explained the invention in view of the cited prior art. In particular, Applicant pointed out that the prior art does not disclose or fairly suggest the navigation key as claimed in Claims 35 and 36. Applicant also pointed out that the prior art does not add any predictive characters to an already displayed set of characters, as does the claimed subject matter of Claims 1 and 35. The Examiner pointed out to Applicant that the first clause before the "or" in the second step of Claim 1 might be read on by the prior art and to take a closer look at it. The Examiner appeared to agree to reconsider his rejections upon further review. If Applicant has misstated any aspect concerning the interview, Applicant apologizes in advance and invites the Examiner to make any corrections if necessary.

### CLAIM REJECTIONS - 35 U.S.C. §102

Claims 35 and 36 are rejected under 35 U.S.C. §102(e) as being anticipated by Williams (US 7155683). Applicant respectfully traverses.

As discussed during the interview, Claim 35 recites, in part:

> wherein the user interface comprises **a navigation key** having **a first set of controls** for acceptance or non-acceptance of a most probable completion alternative currently displayed at the display and **a second set of controls** for changing or overriding the most probable completion alternative currently displayed at the display. (Emphasis added)

That is, Claim 35 recites a single navigation key that alone has two sets of controls by which the user can indicate four options: acceptance, non-acceptance, change, and override. An visual example of such a navigation key is found in FIG. 1. And, FIG. 1 clearly indicates the two set of controls which are used to select the four option above.

The two sets of control are shown as the up control 155 and the down control 165 and the right control 160 and the left control 170.

None of the prior art alone or in combination disclose or fairly suggest the navigation key of Claim 35. At best, the Office Action at page 3 relied on Williams at col. 6, lines 43-52 and col. 7, line 43 – col. 8, line 14. This is incorrect. At col. 6, lines 43-52, Williams teaches accepting a word by the user pressing the space key. However, a space key is a singular key, but it is not a key that has a first set of controls for acceptance or non-acceptance of a most probable completion alternative currently displayed at the display and a second set of controls for changing or overriding the most probable completion alternative currently displayed at the display, as claimed.

At col. 7, line 43 – col. 8, line 14, Williams teaches a *-key 66, a left softkey 25, a space-key 67, a right softkey 26, and a clear key 9. As well, Williams discloses the functions of each of the keys. Each key has a particular function. However, none of the keys have the two sets of controls that can allow a user to select among four options, as does Claim 35. Thus, Williams fails to disclose all the features of Claim 35. Therefore, Claim 35 is patentable in view of Williams. Removal of the rejection and reconsideration are respectfully requested.

Claim 36 depends directly from Claim 35, which has been discussed. Therefore, Claim 36 is deemed patentable for the reasons given above. In addition, Claim 36 separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for Claim 36 at this time. Removal of the rejection and reconsideration are respectfully requested.

CLAIM REJECTIONS – 35 U.S.C. § 103

(a) Claims 1, 5-10, 16-20 [sic], and 25-29 are rejected under 35 U.S.C. §103(a) as being unpatentable over Williams in view of Bodnar *et al* ("Bodnar") US 6310634. Applicant respectfully traverses.

Claim 1 has been amended to recite, in part:

> adding the most probable completion alternative to the content string entry line of said display for said second input being said selection key and said most probable completion alternative being most probable sub-string, and adding a second completion alternative for said second input being said second key, said second completion alternative being either a most probable combination of said most probable first character selected from said first set of textual characters and a most probable second character selected from said second set of textual characters, or a most probable second sub-string, said second sub-string beginning with said most probable first character and including said most probable second character and including at least a most probable third character.

That is, there are two scenarios for the first most probable completion alternative. It is either a character, such as the letter "t," or a sub-string, such as "te." If the selection key is input, then for the first case, according to the claim, a most probable sub-string is added. For example, if the first most probable completion alternative is the letter "t," then an example of the added sub-string could be "ea" to render "tea."

If the second key is input, then the added sub-string could be, for example, "ele" for "tele."

If the first most probable completion alternative is a sub-string, such as "te," and the selection key is input, then according to the claim, a most probable sub-string is added. For example, "st" could be added to result in the selected word, "test."

If the first most probable completion alternative is a sub-string, such as "te," and the second key is input, then the added sub-string could be, for example, "le" for "tele."

In contrast, Williams does not disclose "adding" a sub-string to what is already displayed, as is claimed in Claim 1 and described above. Williams only discloses changing the characters of what the user has inputted to try to predict the word or phrase that the user desires. For example, FIG. 6 and accompanying text of Williams shows how a user enters one character at a time and how the characters, which were already displayed, **change**. That is, in Williams, when starting to type a word, the user simply presses the digit key containing the desired letter once. FIG. 6 second to fifth display shows how the user presses the following keys (once) in order to type the word "case": "2 abc" to insert the "c" "2 abc" to insert the "a" "7 pqrs" to insert the "s" "3 def" to insert the "e". Thus, the user enters a character at a time and what is already displayed evolves to a predicted word or part of a word according to an algorithm. However, never does Williams "add" a sub-string to what is already displayed.

Williams' FIG. 9 may at first view appear to "add" a sub-string to what is already displayed. For example, at FIG. 9, Williams shows, in the last box, the word, Steamloco, with "loco" underlined, which appears to suggest that the underlined part was predicted and completed by Williams' program. But, upon careful reading of Williams for this part, Williams only discloses that the user had, in effect, "locked" the first part of the word, "Steam" and continued to enter the rest of the letters, "loco." That is, Williams states at col. 11, lines 8-12 (emphasis added):

> When the user continues to enter letters **only the letters 78 entered after the pressing of the navigation key 28 will be active**. However when the entering is finalized the full word "steamlocomotive" will be displayed as a single word.

That is, only the letters entered after "Steam" are active. Thus, the user entered "loco," which is not what is claimed in Claim 1.

Bodnar fails to disclose or fairly suggest the portion of Claim 1, as well. Bodnar discloses a system that can present in-context options for each application running on a target device and can present appropriate options during different phases of the

execution of a variety of tasks. However, Bodnar does not teach the particular features of Claim 1 as outlined above.

Therefore a skilled person in the art would have no reason to combine Williams and Bodnar and no reason based on the references to arrive at the subject matter of Claim 1. Removal of the rejection and reconsideration are respectfully requested.

Claim 25 was amended similarly to Claim 1 and thus is patentable for at least the same reasons as for Claim 1.

DEPENDENT CLAIMS

The dependent claims depend directly or indirectly from the claims that have been discussed. Therefore, those claims are deemed patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time. Removal of the rejection and reconsideration are respectfully requested.

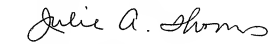
(b) Claims 11 and 16-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Williams in view of Bodnar and further in view of Simpson *et al* ("Simpson") US 2004/0153963. Applicant respectfully traverses.

The dependent claims depend directly or indirectly from the claims that have been discussed. Therefore, those claims are deemed patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time. Removal of the rejection and reconsideration are respectfully requested.

## CONCLUSION

Applicant respectfully posits that the pending claims are distinguished from the art of record, and that all rejections of the claims are overcome. Accordingly, Applicant respectfully requests allowance of all claims. The Examiner is invited and encouraged to contact Applicant's attorney or agent at (650) 474-8400 should any questions arise.

Respectfully submitted,



Julia A. Thomas
Reg. No. 52,283

Customer No. 22,862